

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>12-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>March 22, 2012</u></b>
<b>FLINT ANDREW STATON</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1343 (wire fraud –</b>
	<b>:</b>	<b>2 counts)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	<b>:</b>	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNTS ONE AND TWO**

**THE GRAND JURY CHARGES THAT:**

**THE SCHEME**

1. From on or about August 25, 2003 to on or about the present date,  
defendant

**FLINT ANDREW STATON**

devised and intended to devise a scheme to defraud various car financing companies, including the Toyota Motor Credit Corporation, the General Motors Acceptance Corporation, and the Nissan Motor Acceptance Corporation, and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

**MANNER AND MEANS**

2. It was part of the scheme that defendant FLINT ANDREW STATON consistently overstated his income on written applications to qualify for financing of luxury cars. After obtaining these luxury cars for his personal use, defendant STATON eventually defaulted

on his payment responsibilities, and thereby caused a loss to car financing companies in the amount of at least \$119,167.46.

The 2003 Jaguar X Type

3. On or about August 25, 2003, defendant FLINT ANDREW STATON filled out or caused to be filled out a Jaguar Credit/Leasing Corporation application falsely claiming that his gross monthly income was approximately \$4,900, and declaring that he had been working at Access Business Solutions as an account executive for two years and six months, when none of these facts were true.

4. By virtue of these false representations, defendant FLINT ANDREW STATON caused CAB East LLC to extend credit to him for the lease of a 2003 Jaguar X Type.

5. Defendant FLINT ANDREW STATON fraudulently appropriated to his own use the 2003 Jaguar X Type.

6. Defendant STATON made all required car payments on the Jaguar, but to date has not repaid \$395.00 in charges remaining on the lease.

The 2003 Chevrolet Silverado

7. On or about May 31, 2006, defendant FLINT ANDREW STATON filled out or caused to be filled out a Toyota Financial Services and Lexus Financial Services credit application falsely claiming that his gross monthly income was at least \$3,120, and declaring that he had been the manager and part owner of Haas Seafood for three years, when none of these facts were true.

8. By virtue of these false representations, defendant FLINT ANDREW STATON caused the Toyota Motor Credit Corporation to extend credit to him for the purchase of a 2003 Chevrolet Silverado.

9. Defendant FLINT ANDREW STATON fraudulently appropriated to his own use the 2003 Chevrolet Silverado.

10. Defendant FLINT ANDREW STATON made only 47 of 60 monthly payments, caused a repossession order to be issued, and caused a final charge off loss of \$5,140.46 to the Toyota Motor Credit Corporation.

The 2007 Hummer H2

11. On or about January 29, 2007, defendant FLINT ANDREW STATON filled out or caused to be filled out a Scott Credit application falsely claiming that his annual income was \$120,000 as vice president of First Choice Imaging, when none of these facts were true.

12. By virtue of these false representations, defendant FLINT ANDREW STATON caused the General Motors Acceptance Corporation to extend credit to him for the lease of a 2007 Hummer H2.

13. Defendant FLINT ANDREW STATON fraudulently appropriated to his own use the 2007 Hummer H2.

14. Defendant FLINT ANDREW STATON made only 10 of 39 monthly payments, caused a repossession order to be issued, and caused a final charge off loss of \$55,116.19 to General Motors Acceptance Corporation.

The 2001 Porsche Boxster

15. On or about May 3, 2007, defendant FLINT ANDREW STATON filled out or caused to be filled out another Toyota Financial Services and Lexus Financial Services credit application falsely claiming that his gross monthly income was \$8,000, and declaring that he had been the manager and owner of E.A. Haas Seafood for three years, when none of these facts were true.

16. By virtue of these false representations, defendant FLINT ANDREW STATON caused the Toyota Motor Credit Corporation to extend credit to him for the purchase of a 2001 Porsche Boxster.

17. Defendant FLINT ANDREW STATON fraudulently appropriated to his own use the 2001 Porsche Boxster.

18. Defendant FLINT ANDREW STATON made only 5 of 60 monthly payments, caused a repossession order to be issued, and caused a final charge off loss of \$27,088.47 to Toyota Motor Credit Corporation.

The 2007 Nissan Maxima SE

19. On or about May 14, 2007, defendant FLINT ANDREW STATON filled out or caused to be filled out a Lancaster Nissan credit application falsely claiming that his yearly income was \$100,000, and declaring that he had been vice president of First Choice Imaging for five years, when none of these facts were true.

20. By virtue of these false representations, defendant FLINT ANDREW STATON caused the Nissan Motor Acceptance Corporation to extend credit to him for the lease of a 2007 Nissan Maxima SE.

21. Defendant FLINT ANDREW STATON fraudulently appropriated to his own use the 2007 Nissan Maxima SE.

22. Defendant FLINT ANDREW STATON made only 9 of 36 monthly payments, caused a repossession order to be issued, and caused a final charge off loss of \$31,427.34 to the Nissan Motor Acceptance Corporation.

**THE WIRES**

23. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

**FLINT ANDREW STATON,**

for the purpose of executing the scheme described above, attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted by means of wire communication in interstate commerce, certain signals and sounds, as described below:

<b>Count</b>	<b>Date</b>	<b>Description</b>
1	May 4, 2007	Dealer Application Report submitted from Toyota Financial Services in Horsham, PA online to Route One based in Farmington Hills, MI related to a 2001 Porsche Boxster.
2	May 22, 2007	Wire transfer from Nissan Motor Acceptance Corporation in Irving, TX to Lancaster Nissan, Inc. in Lancaster, PA for \$1,919.08 related to a 2007 Nissan Maxima SE.

In violation of Title 18, United States Code, Sections 1343 and 2.

## **NOTICE OF FORFEITURE**

### **THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1343, as set forth in this indictment, defendant

**FLINT ANDREW STATON,**

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to a 2001 Porsche Boxster (VIN WP0CB29801U664157) and a 2003 Chevrolet Silverado (VIN 2GCEK19T431158448).

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

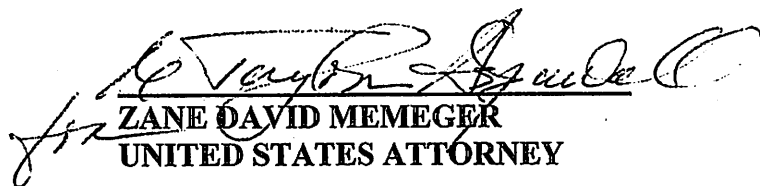
it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 981(a)(1)(C).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
**UNITED STATES ATTORNEY**

No. \_\_\_\_\_

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

FLINT ANDREW STATON

INDICTMENT

Counts

18 U.S.C. § 1343 (wire fraud- counts)

A true bill.

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Foreman

Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

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Clerk

Bail, \$ \_\_\_\_\_

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